

**REMARKS****Status of Claims**

The Office Action mailed January 6, 2005 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-24 were pending in the application. Claims 1, 19, 20, and 24 have been amended and no claims have been cancelled or newly added. Therefore, claims 1-24 are pending in the application and are submitted for reconsideration.

This amendment changes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

**Prior Art Rejections**

In the Office Action, claims 1-12, 15-18, 20, 21, 23, and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Mehra et al. article “Designing a flexible services-based architecture for Internet Applications” (hereafter “Mehra”) in view of U.S. patent no. 6,286,028 to Cohen et al. (hereafter “Cohen”). Claims 13, 14, 19, and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Mehra and Cohen further in view of U.S. patent no. 6,434,555 to Frolund et al. (hereafter “Frolund”). Applicants respectfully traverse these rejections for at least the following reasons.

Each of the independent claims 1, 19, 20, and 24 recite an apparatus, method, or software for interfacing between front-end data processing systems and back-end data processing systems wherein the interface comprises several layers with specifically recited features that best isolate changes between the several layers. In particular, each of the independent claims recite that the engine (that receives the message from the front end system) (1)*interprets* the received message and *uses a process map* to select among a plurality of nodes (that contain business logic); (2) wherein the message does not include an operation identifier; and (3) the engine does not contain any business logic. In this way, the claimed system and method isolates the business logic to the process map and the nodes in the node layer. See, for example, page 7-8 of the specification which disclose how the process maps are dynamically built based on node classes which expose their capabilities in terms of

business tasks to be completed or messages to be handled. The engine interprets a received messages and uses the process map to determine which nodes to create to handle the received message so that the received message does not need to contain an operation identifier of the transaction to be performed. These recited features are not disclosed or suggested by the applied prior art.

As acknowledged in the office action, Mehra does not disclose an application architecture in which the engine that processes the messages from the external system does not include any business logic. Furthermore, Mehra discloses that a business controller object that represents business logic based on a (static) use case (or a set of use cases) receives the input data and instantiates business objects in contrast to the claimed invention that *interprets* the received message and uses a *dynamic* process map to select relevant nodes from a plurality of nodes for processing the message. Therefore, neither Mehra nor the newly applied Cohen patent disclose or suggest the claimed feature where the engine does not receive any operation identifier that identifies the transaction to be performed but rather interprets the received message based on a dynamically maintained process map. Therefore, neither Mehra nor Cohen (and therefore neither their reasonable combination) disclose or suggest the claimed engine that interprets the received message and uses the exposed node business logic capabilities in a process map to select the relevant node from a plurality of nodes.

This deficiency in the combination of Mehra and Cohen is not cured by the any of the applied references. Accordingly, the office action fails to make a *prima facie* case of obviousness with respect to the currently pending claims.

These recited features provide the benefit that the external application does not need to know a specific operation id and this serves to further isolate the external applications from the details of the various nodes and their capabilities. Furthermore, as recited in dependent claim 2, the claimed engine dynamically maintains the process map according to the exposed node business logic capabilities and this process would not be effective if the external applications had to *apriori* know the operation identifiers of the various nodes in the dynamically maintained process map. Therefore, neither the specific recited features nor its

advantages are disclosed or suggested by the applied prior art. Accordingly, the pending independent claims are patentable over the applied prior art.

The dependent claims are also in condition for allowance for at least the same reasons, as discussed above, as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a whole.

### Conclusion

In view of the foregoing amendments and remarks, applicants respectfully request entry and consideration of the instant amendment and reply because it is believed to place the application in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicants hereby petition for any needed extension of time.

Respectfully submitted,

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